UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAFAYETTE DIVISION

FELIPE DE JESUS AVILA-SOTO, AND OTHERS SIMILARLY SITUATED

No: 6:24-CV-01392

DISTRICT JUDGE:

ROBERT R. SUMMERHAYS

V. MAGISTRATE JUDGE: CAROL B. WHITEHURST

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION AND STERLING SUGARS, LLC

SECOND NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that undersigned counsel for the Defendants, South Central Sugar Cane Growers' Association and Sterling Sugars, LLC (collectively, "Defendants"), will take the oral depositions of Plaintiffs, **FELIPE DE JESUS SUAREZ-PALAFOX AND JUAN ALEJO HERNADEZ-CANELA** for all purposes allowed under the Federal Rules of Civil Procedure, before a Notary Public or other officer duly authorized to administer oaths, and that the depositions will be recorded by audio and stenographic means. The depositions will take place as follows:

Deponent	Date	Time	Location
Felipe de Jesus Suarez-	December 12, 2025	9:00 am	Phelps Dunbar
Palafox			400 Convention Street
			Suite 1100
			Baton Rouge, LA 70802
Juan Alejo Hernandez-	December 12, 2025	Immediately	Phelps Dunbar
Canela	(and continuing onto	following	400 Convention Street
	December 13, 2025 as	conclusion	Suite 1100
	needed)	of prior	Baton Rouge, LA 70802
		deposition	

The stenographic means of transcription and translation may be completed remotely while testimony is completed in person at the above-referenced location. Remote arrangements are in

EXHIBIT A

place to permit remote access for participating counsel. Translation services are established through certified translators in accordance with law and may also proceed via remote means as necessary.

Respectfully submitted,

PHELPS DUNBAR LLP

/s/ Molly McDiarmid

Brandon E. Davis (La Bar #29823)
Molly McDiarmid (La Bar #36426)
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CERTIFICATE OF SERVICE

I do hereby certify that I have on this 20th day of November, 2025 served a copy of the foregoing Notice of Deposition on counsel for all parties to this proceeding by email transmission.

/s/ Molly McDiarmid
Molly McDiarmid